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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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AUG 26 2009

2 COMMISSIONERS

3 KRISTIN K. MAYES, Chairman 2009 AUG 26 P 4: 33
4 GARY PIERCE
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AZ CORP COMMISSION
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6 IN THE MATTER OF ARIZONA PUBLIC
7 SERVICE COMPANY AND VERIZON
8 CALIFORNIA, INC.'S JOINT PETITION FOR THE
9 ESTABLISHMENT OF AN UNDERGROUND
10 CONVERSION SERVICE AREA.

DOCKET NO. E-01345A-07-0663
DOCKET NO. T-01846B-07-0663

STAFF'S OPENING BRIEF

9 I. INTRODUCTION.

10 This case arises pursuant to A.R.S. § 40-341 *et seq.*, *Conversion of Overhead Electric and*
11 *Communication Facilities*. This statute allows property owners to petition the appropriate public
12 service corporations to convert overhead electrical and communications facilities to underground
13 facilities under certain conditions. If those conditions are met, the public service corporations are
14 then obligated to petition the Arizona Corporation Commission ("ACC" or "Commission") for an
15 order establishing an underground conversion service area ("UCSA") and directing the conversion of
16 overhead facilities to underground.

17 In this case a full evidentiary hearing was held and a Recommended Opinion and Order was
18 issued for Commission consideration. The Commission directed that the record remain open to
19 develop more evidence on the issue of economic feasibility. The passage of time has generated more
20 questions over the interpretation of portions of A.R.S. § 40-341 *et seq.* Procedurally, we are now in
21 uncharted water. There are no cases on point; and no previous Commission decisions to offer any
22 guidance.

23 The establishment of an UCSA in the Hillcrest Bay area has generated a significant amount of
24 angst in this small community. An UCSA can bring with it community upheaval and significant
25 costs to property owners. To assist citizens with improving the aesthetics of their property and to
26 spread the costs as fairly as possible within the UCSA, the Legislature, through the passage of the
27 UCSA statutes, has provided citizens with the means to accomplish the undergrounding of overhead
28 utilities. With no case law or legislative history, Staff will attempt the difficult task of interpreting

1 the statutes and providing meaningful guidance to assist in the determination of this matter. While
2 Staff, in the initial proceeding, recommended approval of the Joint Petition, the unprecedented
3 change in the economy coupled with the numerous withdrawals and letters of protest lodged by
4 property owners of Hillcrest Bay Mobile Manor are indications of waning community support. Staff
5 therefore recommends that the Commission dismiss the Joint Petition.

6 **II. BACKGROUND.**

7 The property owners within the Hillcrest Bay Mobile Manor ("Hillcrest"), near Parker,
8 Arizona, submitted petitions to Arizona Public Service Company ("APS") in order to convert
9 overhead facilities within their area to underground. In 2006, APS received a petition requesting that
10 a joint cost study be prepared. APS determined that the initial statutory requirements had been met,
11 i.e., sixty percent of the property owners owning over sixty percent of the real property on a square
12 footage basis. APS then coordinated with Verizon California, Inc. ("Verizon") for the production of
13 Verizon conversion cost estimates in order to develop a joint report to the Hillcrest property owners.
14 APS, on behalf of itself and Verizon, mailed each property owner within the proposed underground
15 conversion service area a copy of the Joint Report of Estimated Utility Conversion Costs, which
16 contained the cost estimates of both APS and Verizon to convert the overhead lines of the companies
17 to underground facilities. In June 2007, APS received the second set of petitions from Hillcrest. The
18 La Paz County Assessor certified that the copies of the petitions for the property
19 owners were correct as stated with the address ("Establishment Petition"). APS and Verizon then
20 filed the Joint Petition that is the subject of this action.

21 An evidentiary hearing was held on January 28, 2008. At the conclusion, Staff, APS and
22 Verizon filed closing briefs. A Recommended Opinion and Order ("ROO") was issued and set for
23 the July 1 and 2, 2008, Open Meeting. At the Open Meeting on July 1, there was a lengthy
24 discussion, and the Commission ultimately pulled the ROO from the agenda without decision to
25 allow the parties time to file additional information in the docket regarding the issue of economic
26 feasibility. The Commission directed the Hearing Division to issue a Procedural Order to keep the
27 record open for 10 months to allow parties to make the additional filings.

1 On April 1, 2009, a notice of appearance was filed on behalf of Hillcrest Bay, Inc. ("HBI").
2 On May 1, 2009, APS filed an economic feasibility update for the UCSA. APS indicated that, while it
3 did not anticipate that the costs for the UCSA would decrease, it would re-bid the UCSA project if
4 the UCSA is approved. HBI filed updated documentation in support of the UCSA. HBI stated that it
5 had created a financial assistance program to assist low-income owners through assistance to be
6 provided by Tades, Inc. ("Tades"), the trenching contractor. HBI also provided two revised cost
7 estimates, the first of which shows an overall reduction in private costs of \$51,093 and the second of
8 which shows an overall reduction in public costs of \$665,124 based upon an assumption that Tades
9 will be permitted to do some of the work for which APS and Verizon previously provided public cost
10 and service cost estimates. There was no indication submitted by HBI that APS or Verizon agreed to
11 allow Tades to perform any of this work. HBI also submitted a letter from Phil Garcia, a former
12 appraiser, who opined that the undergrounding could increase property values by 80 percent for the
13 properties in Hillcrest Bay. HBI also included a tabulation of the results to a petition mailed in July
14 2008, for which 193 responses were received, 127 in favor and 66 opposed. An updated property list
15 showing ownership as provided by the La Paz County Recorder's office as of April 9, 2009 was
16 submitted. Ownership of five parcels has changed and several parcels have been combined. HBI
17 also stated that there are safety and health issues related to utility lines hanging over backyards and
18 patios.

19 By procedural order dated May 11, 2009, the parties were ordered to submit pre-hearing
20 briefs on July 6, 2009, and a hearing was scheduled for July 21 and 22, 2009. HBI asserted in its
21 prehearing brief that, at the time of the first hearing in this matter, the Commission should have
22 determined whether or not there was forty percent or more opposition of forty percent of the property
23 owners owning 40 percent of the property.¹ HBI also asserted that the withdrawal of signatures
24 should not be counted. A hearing was held on July 21 and 22, 2009, on the issue of economic
25 feasibility.

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28 ¹ 2nd Hearing TR 23:17-25, HBI Prehearing brief at 5-6.

1 At the close of the hearing, the Administrative Law Judge directed several issues to be
2 discussed: (i) an analysis of the meaning of the language of A.R.S. § 40-346(A) with respect to the
3 standard necessary for the approval of an UCSA; (ii) whether the new hearing provided the property
4 owners a renewed opportunity to make timely withdrawals of signatures and objections; (iii) should
5 the petition be dismissed because of the current level of support; and (iv) whether the service costs
6 can be attributed on a square footage basis.

7 **III. OVERVIEW OF CONVERSION PROCESS.**

8 The conversion process begins with a petition signed by not less than 60 percent of the
9 owners of contiguous real property within the area who own not less than 60 percent on a square foot
10 basis of the real property within the area. The petition is directed to the appropriate public service
11 corporation to initiate a study of the cost associated with the conversion of overhead to underground.²
12 Within 120 days of receipt of such a petition, each public service corporation serving the area sought
13 to be designated for underground conversion required to make a study of the cost of conversion of the
14 facilities to underground.³ Once that study is complete, a summary of the estimate of the cost to be
15 assessed against each lot or parcel of real property is to be made available to each owner of real
16 property located within the proposed underground conversion service area.⁴

17 Once the cost study is made available to the property owners, they have 90 days in which to
18 decide whether they want to continue with the process of conversion. If so, 60 percent of the owners
19 of real property representing 60 percent of the real property's area within the proposed conversion
20 service area must petition each public service corporation for the establishment of an underground
21 conversion area. Upon receipt of this petition, the public service corporation has sixty days in which
22 to petition the Commission for the establishment of an underground conversion service area.⁵ After
23 appropriate notice is provided as required by statute, the Commission is required to conduct a hearing
24 regarding the establishment of the underground conversion service area.⁶

26 ² A.R.S. § 40-342(A).

27 ³ A.R.S. § 40-342(D).

⁴ A.R.S. § 40-342(F).

⁵ A.R.S. § 40-343(B).

28 ⁶ A.R.S. § 40-346.

1 On the same day that the joint petition is filed, A.R.S. § 40-343 requires recording a notice of
2 proposed lien where the affected property is located. A.R.S. § 40-344 requires any person wishing to
3 withdraw from the petition or objecting to the establishment of the UCSA to file such objections with
4 the Commission not later than ten days prior to the date set for hearing. A.R.S. § 40-345 specifically
5 provides the procedure by which the Commission is to determine the validity of protest, objections
6 and withdrawal of signatures from the petition. If, after the hearing, the Commission determines that
7 no more than 40 percent of the owners who own no more than 40 percent of the real property within
8 the proposed UCSA have not objected to the formation of the UCSA and if the Commission
9 determines that the conversion is economically and technically feasible, the Commission is required
10 to issue an order establishing the area as a UCSA.⁷

11 **IV. STANDARD OF APPROVAL UNDER ARS § 40-346(A).**

12 There was no testimony or legal arguments presented in the July 2009 hearings to cause Staff
13 to change its position from its March 21, 2008 brief regarding the statutory requirement for approval
14 of the UCSA. HBI's assertion would lead to an absurd result and should be disregarded.

15 The primary rule of statutory construction is to find and give effect to legislative intent.⁸ The
16 starting point for interpretation of a statute "is the language of the statute itself."⁹ Words are given
17 their ordinary meaning unless the context of the statute requires otherwise.¹⁰ If the language of a
18 statute is clear and unambiguous, the court will apply the plain meaning of the language unless a
19 plain meaning interpretation would lead to an absurd result that or a result that is at odds with the
20 legislature's intent.¹¹ When a statute is ambiguous or when a proposed construction would result in
21 an absurd result, a court may then "consider the statute's context; its language, subject matter and
22 historical background; its effects and consequences; and its spirit and purpose."¹²

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25 ⁷ A.R.S. § 40-346.

⁸ Mail Boxes v. Industrial Commission 181 Ariz. 119, 121, 888 P.2d 777, 779 (1995).

26 ⁹ Kaiser Aluminum & Chem Corp v. Bonjorno, 494 US 827, 835 (1990) quoting Consumer Prod. Safety Comm'n v. GTE
Sylvania, Inc. 447 US 102, 108 (1980).

27 ¹⁰ A.R.S. § 1-213.

¹¹ Kaiser Aluminum & Chem Corp v. Bonjorno, 494 US 827, 835 (1990) quoting Consumer Prod. Safety Comm'n v.
GTE Sylvania, Inc. 447 US 102, 108 (1980).

28 ¹² Callan v. Bernini, 213 Ariz 257, 260 quoting Hayes v. Continental Ins. Co, 178 Ariz 264.

1 As acknowledged by APS and Verizon, there are no reported court decisions regarding the
2 interpretation of this statute. The legislative history sheds no light. It would be reasonable to
3 conclude that the legislative intent is to provide a means for the conversion of overhead facilities to
4 underground if, after notice, a majority of the property owners agree to bear the costs, the property
5 owners have an opportunity to be heard, and Staff reviews the technical and economic feasibility of
6 the project. To aid in determination on how best to proceed, Staff provided an overview of three
7 previous Commission decisions in its March 21, 2008 brief.

8 In Decision No. 55490, an UCSA was established following an application submitted by
9 Tucson Electric Power ("TEP") and The Mountain States Telephone and Telegraph Company
10 ("Mountain Bell"). In *Tucson Electric Power*, TEP and Mountain Bell submitted a petition for the
11 establishment of a UCSA because property owners within a section of Oro Valley Estates subdivision
12 requested TEP and Mountain Bell to convert overhead facilities within their area to underground. In
13 that case, TEP found that 62.05 percent of the property owners owning more than 60 percent of the
14 real property in the conversion area had validly signed the petition.

15 In that Decision, the Commission found that "[a]side from the Commission's finding
16 regarding *feasibility* of conversion, the Commission's only function herein is to determine whether 40
17 percent or more of all the property owners have objected to the formation of the underground CSA
18 [conversion service area]"¹³ The Commission did not assess any apparent ambiguity with the
19 statutory construction of A.R.S. § 40-346(A), finding that "the Petitioners and property owners have
20 satisfied all requirements provided by the laws of the State of Arizona for the formation of an
21 underground CSA...and that [s]ome owners of real property within the underground CSA objected to
22 the formation of said area but the objections were insufficient to affect its formation."¹⁴ The Decision
23 does not record the number of objections or the number of those "who have not objected," but
24 reaches its decision by focusing on the number of property owners who were in support of the UCSA,
25 which was approximately 62.05 percent. It appears that the Commission took a common sense
26 approach in its interpretation of the statute.

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28 ¹³ Dec. No 55490, Dockets No. U-1933-86-193, E-1051-86-193 (March 19, 1987).

¹⁴ *Id.* at 10.

1 The other Decision on the issue found that 69 percent of the owners owning 74 percent of the
2 property signed the establishment petition and that the requirements for the establishment of an
3 underground conversion service area had been satisfied. In that matter, there were no objections and
4 no withdrawal of signatures, but the focus was on the number of property owners who were in favor
5 of an UCSA.¹⁵ It should also be noted, that in that docket, the Town of Paradise Valley agreed to pay
6 2/3 of the conversion costs.

7 Decision No. 67437 construes the meaning of less than 40 percent who have not objected as
8 meaning more than 40 percent have objected.¹⁶ In that case, Salt River Project ("SRP") received a
9 petition from the Park Paradise Conversion District requesting that a cost study be performed for the
10 establishment of an UCSA. SRP coordinated the production of conversion cost estimates with Qwest
11 Corporation ("Qwest") and Cox Communications. Qwest filed the petition with the Commission.
12 More than ten days prior to the hearing, a number of withdrawals and objections were lodged with
13 the Commission.

14 During the hearing, Staff witness Del Smith testified that only 51.825 percent of the square
15 footage of the property owned was in favor of the project; the percentage of property voting against
16 was 48.175 percent¹⁷ After the timely withdrawal of signatures, Mr. Smith testified that only 52.78
17 percent of the property owners were in favor at the time of the hearing.¹⁸ Mr. Smith further testified
18 that Staff concluded that after 3 signatures were withdrawn, "it drops down below the requirement of
19 60 percent of the property owners owning 60 percent of the real property within the conversion
20 service area."¹⁹

21 In the *Qwest* matter, there was a timely withdrawal of signatures prior to the hearing. It should
22 also be noted that while there was over 48 percent opposition, Staff focused on the requirement that
23 there be 60 percent in favor of proceeding.

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26 ¹⁵ Dec. No. 57051, Docket No. E-1051-90-129 (August 22, 1990).

27 ¹⁶ Dec. No. 67437, Docket No. T-01051B-04-0276 (December 6, 2004).

¹⁷ Qwest TR 30:19-25.

¹⁸ Qwest TR 31:1-3.

28 ¹⁹ Qwest TR 31:7-10.

1 The footnote, in the Procedural Order dated February 22, 2008, noted that A.R.S. § 40-
2 346(A) "taken literally ... means that if 100% of the owners have not objected, there is a problem (as
3 owners of more than 40% would have not objected)."²⁰ This would lead to a result that would
4 frustrate the obvious legislative intent, that if a substantial number of property owners are willing to
5 bear the cost of conversion, after being given ample notice and opportunity to affirmatively express
6 disapproval, then the conversion should go forward. Further, in the two Commission decisions
7 interpreting A.R.S. § 40-346(A), the Commission gave a common sense reading to a rather
8 ambiguous statute.

9 In preparation for the first hearing, in looking at the petitioners, the protest letters and the
10 withdrawals, Staff determined that there were 239 parcels within the proposed UCSA. Of the 239
11 parcels, 151 property owners voted yes²¹ as indicated by their signatures affixed to the Establishment
12 Petition. Those 151 property owners comprised over 60 percent of the property owners owning 60
13 percent or more of the square footage. Staff reviewed 38 letters of protests or no votes, associated
14 with discrete parcels, as of 10 days prior to the date of the hearing. There was no response from the
15 remainder of the property owners, even after the substantial notice that is given under the statute.

16 Prior to the second hearing, Staff determined the level of support to be as follows:

	Yes votes	% of owners	% of Square footage
17 Parcel 274 in/no vote change (ROO)	149	62.917%	59.69%
18 Parcel 274 in/no vote change/new petition	129	54.4%	52.5%
19 Parcel 274 in/ vote change/new petition	119	50.2%	48.7%
20 Parcel 274 out/no vote change/new petition	129	54.7%	54.2%
21 Parcel 274 out/vote change/new petition	119	50.4%	50.2%

22 This table attempts to show five scenarios: (a) the votes and associated square footage as
23 represented by the ROO; (b) the votes and associated square footage under the new petition with the
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28 ²⁰ TR 34:23-25; 35:1-11.

²¹ Previous to the January 18, 2008 hearing.

1 inclusion of Parcel 274 and no acceptance of the new withdrawals; (c) the votes and associated
2 square footage with the inclusion of Parcel 274 and the acceptance of the new withdrawals; (d) the
3 exclusion of Parcel 274 and no acceptance of the new withdrawals; and (e) the exclusion of Parcel
4 274 and the acceptance of the new withdrawals. Staff would note that in the second hearing, there
5 was no testimony on the inclusion of Parcel 274.

6 If viewed similarly to the view of the Commission in Decision No. 55490 and Decision No.
7 67437, the focus appears to be whether there are more than 60 percent of property owners owning 60
8 percent of the square footage in favor of the UCSA or whether forty percent or more of the property
9 owners owning forty percent or more or the property object to the UCSA. If more than 40 percent
10 object, in line with a previous Commission decision, the petition fails; if 60 percent or more are in
11 favor and the conversion is economically and technically feasible, the project goes forward. This
12 reading of the statute is a common sense view and appears to approximate the legislative intent: that
13 more than a simple majority of the property owners in a proposed UCSA understand the costs of the
14 conversion and are willing to pay.

15 HBI, in its prehearing brief, advances a novel interpretation of A.R.S. § 40-346(A).²² Under
16 HBI's approach, if at the time of the hearing, only 40 percent object (and assuming the 40 percent
17 own 40 percent of the land), 10 percent remain silent, and 50 percent vote yes, the conversion should
18 go forward, because 40 percent of the landowners have not objected to the formation. Such a result
19 would seem to contradict the requirements of A.R.S. § 40-342(A) and 40-343(A) that require 60
20 percent support to commence the process.

21 It would appear that the legislative intent is to have more than a simple majority in support of
22 the project to move forward. HBI's assertion would not lead to such a result, would frustrate the
23 legislative intent, and should be disregarded.

24 **V. SHOULD THE WITHDRAWAL OF SIGNATURES AFTER THE FIRST HEARING**
25 **AND PRIOR TO THE SECOND HEARING BE ACCEPTED?**

26 As stated in its brief of July 6, 2009, Staff believes that any withdrawals of signatures
27 between the first and second hearing should not be counted for purposes of calculating the requisite

28 ²² HBI Opening Brief at 5-6.

1 statutory percentages to proceed. Staff still maintains that the withdrawals may be considered when
2 examining the economic feasibility of the project. Staff disagrees with the contention of
3 APS/Verizon that the setting of the second hearing somehow “refreshed” the running of the time
4 period in which to object. While there is no case law or Commission decisions on point, Staff would
5 be concerned if such a view were adopted, given the unique circumstances of this docket. Staff
6 would be concerned that there may be unintended consequences of refreshing a statutorily set time
7 period.

8 In most cases, the statutory requirement for withdrawal of signatures was not followed.
9 A.R.S. § 40-345(1) requires that each paper containing signatures shall have attached an affidavit
10 verifying the validity of the signature. One could argue that the failure to follow the statutory
11 requirements invalidates the withdrawals. Staff would argue that the withdrawal also goes to the
12 issue of economic feasibility. This matter has been ongoing since 2006. The second hearing date
13 cast doubt on whether the second hearing revives the time period within which to withdraw
14 signatures. It would be natural, given the state of the economy, for those who may have been in favor
15 in 2006 to have a change of heart in 2009. Should they be precluded from withdrawing their votes?
16 Staff will admit that Arizona law does not provide an express answer. But Staff would urge that the
17 withdrawals be considered as evidence in the weighing of economic feasibility of this project.

18 **VI. CAN THE SERVICE COSTS BE APPORTIONED ON A SQUARE FOOTAGE**
19 **BASIS?**

20 Tades, a contractor retained by HBI, developed new cost estimates, for both the public and the
21 private costs. Tades has proposed to perform work, such as trenching, that would be performed by
22 APS. APS witness Donald Wilson testified that he was uncertain whether Tades was an APS-
23 approved contractor.²³ Mr. Wilson also testified that there were several concerns with the proposal
24 by Tades.²⁴ The APS estimate includes the APS administrative and general load. Mr. Wilson also
25 noted that the allocation of cost on a square footage basis has the potential for an increase in service
26 costs for some lots.

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²³ 2nd Hearing TR 272:13-24

28 ²⁴ 2nd Hearing TR 273:8-20; 274:1-5

1 Staff, in its review of the Tades proposal, noted that there were approximately 28 lots where
2 the cost increased because of the allocation of costs on a square footage basis.²⁵ A review of the
3 applicable statutes does not reveal a basis for assessing all costs associated with the conversion on a
4 square footage basis. With respect to costs of the conversion of undergrounding facilities on public
5 places, A.R.S. § 40-347 (B) states that the cost incurred in placing underground the facilities in public
6 places shall be apportioned among the owners of property within the area on the basis of relative size
7 of each parcel.²⁶ Thus, it appears that there is statutory support for assessing the cost of
8 undergrounding of facilities in public places on a square footage basis.

9 With respect to the other costs, what has been defined as service costs and private costs, the
10 statute is silent as to apportionment. Service costs have been defined as the costs that are associated
11 with providing electric service up to the point on a property where the meter is located.²⁷ Private
12 costs would be the costs of extending service from the meter to the property owner's service panel.²⁸
13 Staff witness Richard Boyles testified at the first hearing that such costs were identified and estimated
14 on the circumstances that existed at each property.²⁹ Because those costs appear to vary due to a
15 number of factors, such as terrain, Staff would assert that those costs should not be apportioned, but
16 borne by each property owner.

17 The public service corporation under the statute is tasked with providing a summary of costs
18 early in the process to assist property owners in the decision whether to proceed with a petition to
19 establish an UCSA. The introduction of new cost estimates and a new manner of apportioning such
20 costs, at this juncture in the process, serves to muddy the already murky water. Staff would urge that
21 the apportionment of private costs on a square footage basis be rejected.

22 **VII. SHOULD THE PETITION BE DISMISSED?**

23 Staff concludes that the petition should be dismissed, but not for the reasons advanced by
24 APS. The Commission, by its procedural order dated July 3, 2008, ordered the record to remain open
25

26 ²⁵ 2nd Hearing TR 260:22-25.

27 ²⁶ Public place "includes streets, alleys, roadways, sidewalks, rights of way, easement and similar properties as to which a
city, town county the state the public service corporation or public agency may have a right. ARS § 40-341 (9).

28 ²⁷ 1st Hearing TR 186:8-123.

29 ²⁸ *Id.*

²⁹ *Id.*

1 to allow for more evidence on the issue of economic feasibility. As evidenced by the testimony
2 during the second hearing, there is waning community support. For example, several property
3 owners, who changed their vote of support to opposition, state because of the poor economy,
4 continued support would pose a hardship.³⁰ Other property owners cited the declining value of their
5 homes as a reason for the withdrawal of support.³¹ There are property owners whose personal
6 economic circumstances have changed dramatically since 2006.³²

7 At the commencement of the second hearing, the Administrative Law Judge took
8 administrative notice that the United States has been in a recession since December 2007.³³ The
9 record shows turmoil in the financial markets, the current recession, and changed financial positions
10 of some of the owners as expressed in letters to the docket. The Commission has the discretion to
11 consider such factors in making a determination. Staff would contend that the dramatic change in the
12 country's economic climate from the commencement of this project till the present has affected the
13 determination of whether such a project remains economically feasible. Staff has concluded that the
14 project is no longer economically feasible and thus, the Petition should be dismissed.

15 **VIII. CONCLUSION.**

16 There is little guidance from previous Commission decisions or relevant case law to assist in
17 shedding light on the statutory construction of A.R.S. § 40-341 *et seq.* Staff could find only three
18 dockets relating to underground conversion within the past 25 years. The last matter before the
19 Commission was in 2004 and the petition failed for lack of the requisite number of petitioners
20 pursuant to the statutory requirements.³⁴

21 The dismissal of the petition does not spell the end of underground conversion for Hillcrest
22 Bay. A petition may be filed again, for a dismissal is without prejudice. Homeowners have the
23 option to undertake underground conversion on their own.

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26 ³⁰ As an example, see the letter in the docket (undated) docketed July 15, 2009 from Linda Marie Seidenglanz and Carol Irene Crane.

27 ³¹ As an example see the letter in the docket (undated) docketed July 10, 2009 from Eileen K. Thompson.

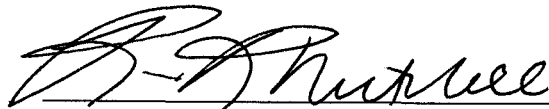
28 ³² As an example, see the letter in the docket dated June 28, 2009 docketed July 6, 2009 from Rick J. McCurdy

³³ The Administrative Law Judge took administrative notice that the U.S. has been in a recession since December 2007.

³⁴ Dec. No. 67437, Docket No. T-01051B-04-0276 (December 3, 2004).

1 The establishment of an UCSA in Hillcrest Bay has generated a significant amount of public
2 comment. An UCSA can bring with it the specter of significant costs to property owners. The
3 Legislature provided a means for citizens to improve the aesthetics of their property and to spread the
4 costs as fairly as possible within the UCSA. Given the unprecedented decline in the United States
5 economy, coupled with the waning community support, certainly the Legislature would not insist
6 upon a rote application of a statute that could impose undue economic hardship on Arizonans. The
7 Commission, in its discretion, has the authority to consider all factors in arriving at its decision. Staff
8 concludes that it is not in the public interest to approve the UCSA.

9 RESPECTFULLY submitted this 26th day of August, 2009.
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11
12

13 

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23 Docket Control
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27 Copy of the foregoing mailed/emailed this
28 26th day of August, 2009 to:

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36 JULIANA PEREZ
37 4169 MENTONE AVENUE
38 CULVER CITY, CA 90232

ROBERT RESTER & PATRICIA ANN HOFFMAN
16729 SAGE CIRCLE
CHINO HILLS, CA 91709

39 BRIAN D. WOOD & ARTHUR WOOD, JR.
40 3217 S. NORTH SHORE DRIVE
41 ONTARIO, CA 91761

GARY & YVONNE SUTTON
31956 ROSALES AVENUE
MURIETTA, CA 92563

1	DAVID & SUSAN THOMAS 3540 465 TH AVENUE ELLSWORTH, WI 54011	GARY W. SMITH 25092 PORTSMOUTH MISSION VIEJO, CA 92692
2		
3	KATHI A. BEVAN 21449 RAY ARMSTRONG ROAD ANDALUSIA, AL 36421-1882	TIMOTHY GORDON & ROBIN ALICIA EVANS 24482 CHAMALEA MISSION VIEJO, CA 92691
4		
5	ARTHUR C. WOOD III; STEVEN D. WOOD BRIAN D. WOOD 3217 S. North Shore Drive ONTARIO, CA 91761	SCOTT D. & GRACE D. BABCOCK 15944 MILVERN DRIVE WHITTIER, CA 90604
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8	LINDA SEIDENGLANZ BILL & CAROL CRANE 15040 KINAI ROAD APPLE VALLEY, CA 92307	RICHARD M. HOYT; MARK A. & KATHY A. HOYT 38821 KILIMANJARO DRIVE PALM DESERT, CA 92211
9		
10	WILLIAM L. & SHARI D. DAGE P.O. BOX 1297 BANNING, CA 92220	RONALD K. & LORRAINE C. JOHNSON 885 CRYSTAL VIEW DRIVE PARKER, AZ 85344
11		
12	GLENN E. ECKER & PATRICIA A. TANGES 880 CRYSTAL VIEW DRIVE PARKER, AZ 85344	MERLE D. & JANET J. CALVIN 862 CRYSTAL VIEW DRIVE PARKER, AZ 85344
13		
14	CHARLES T. & ELLEN L. O'NEILL 22062 BROKEN BOW DRIVE EL TORO, CA 92630	VICTORIA KUKURUDA 30670 WATSON ROAD HOMELAND, CA 92548
15		
16	RAYMOND D. & PATRICIA EASLEY 4161 RICARDO DRIVE YORBA LINDA, CA 92886	JACQUELINE J. & SANDRA J. JOHNSON 809 CRYSTAL VIEW DRIVE PARKER, AZ 85344
17		
18	BOYCE L. & TERESA A. HARKER TRENT W. & LAURA M. HARKER 79-165 CANTERRA CIRCLE LA QUNITA, CA 92253	VICTOR M. & PRISCILLA M. HORTA 8057 ARMAGOSA DRIVE RIVERSIDE, CA 92508
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21	LEAH C. WAGNER 7516 SHOUP AVENUE WEST HILLS, CA 91307	DENNIS & PHYLLIS A. INGRAM 828 CRYSTAL VIEW DRIVE PARKER, AZ 85344
22		
23	CHARLES E. & JUDY RUTLEDGE TRUSTEES, RUTLEDGE FAMILY TRUST P.O. BOX 185 LUCERNE VALLEY, CA 92356	CLIFTON D. & VIOLA J. LEE, TRUSTEES C. LEE FAMILY REVOCABLE TRUST 229 W. TUDOR STREET COVINA, CA 91722
24		
25	WILLIAM & HARLAYNE BOND 6042 W. POTTER DRIVE GLENDALE, AZ 85308	ALBERT O. LAFRENIERE 1691 CHANDLER DRIVE LAKE HAVASU CITY, AZ 86403
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1	ROBERTA A. & DONALD A. ANDERSON 1143 SHARON ROAD SANTA ANA, CA 92706	GREGORY C. & GWENDOLYN MESNA NATHAN J. & WHITNEY MESNA P.O. BOX 2344 RUNNING SPRINGS, CA 92382
2		
3	WYMAN & DONNA J. JOHNSON 17806 QUANTUM PLACE PIERRE, SD 57501	TED & CARLA BULTSMA & LESLIE GOSSINBERGER P.O. BOX 3612 RUNNING SPRINGS, CA 92382
4		
5	TREVOR GOLDI & SIERRA SMITH-GOLDI & EARLINE R. POOL 2775 HILLCREST DRIVE PARKER, AZ 85344	RONALD & MARY P. LEE 14049 FARMINGTON STREET OAKHILLS, CA 92344
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8	JO-ANNE M. LYNN 872 E. SWAN DRIVE PARKER, AZ 85344	JO ANN C. GOLDBACH, TRUSTEE JO ANN C. GOLDBACK REVOCABLE TRUST 880 E. SWAN DRIVE PARKER, AZ 85344
9		
10	DONALD & VIRGINIA VAUGHN 880 E. SWAN DRIVE PARKER, AZ 85344	CUMMINS INVESTMENTS, INC. P.O. BOX 665 LAKE HAVASU CITY, AZ 86405
11		
12	THOMAS P. & CYNTHIA A. MCGREGOR TRUSTEES, MCGREGOR TRUST 914 E. SWAN DRIVE PARKER, AZ 85344	ROBERT W. & CAMILLE A. HUGHES 13803 PEQUOT DRIVE POWAY, CA 92064
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15	JUDI L. NOBLE 1444 E. 13 TH STREET UPLAND, CA 91786	JOHN L & JANE R. SEARS TRUSTEES OF THE SEARS LIVING TRUST 10532 MIRA VISTA DRIVE SANTA ANA, CA 92705
16		
17	JUDITH B. SHIPLEY 14325 LAUREL DRIVE RIVERSIDE, CA 922503	CONSTANCE ANN ESTABROOK 1426 CLEVELAND LOOP DRIVE ROSEBURG, OR 97470
18		
19	RICHARD I. & NANCY L. FISHER 582 W. MOUNT CARMEL DRIVE CLAREMONT, CA 91711	ANTONIO & ILEN ELIAS-CALLES, TRUSTEE, ANTONIO ELIAS-CAL AND ILEN ELIAS-CALLES FAMILY TRUST 18922 FLAGSTAFF LANE HUNTINGTON BEACH, CA 92646
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22	OBERT & BONNIE STRONG 3602 FAIRMAN LAKEWOOD, CA 90712	SHIRLEY M. BOWMAN REVOCABLE LIVING TRUST 3120 INDIAN WELLS PRESCOTT VALLEY, AZ 86314
23		
24	KEVIN D. MARTIN; KEVIN D. & MELANIE MARTIN 1214 LAS AREANS WAY COSTA MESA, CA 92627	THOMAS J. & JUNE K. KRAUS 10765 BARNES ROAD EATON RAPIDS, MI 48827
25		
26	JAMES C. SCHMIDT, JR. & CAROL L. SCHMIDT 26045 MATLIN ROAD RAMONA, CA 92065	RODNEY W. KAWAGOYE & JUDY C. WILSON 2971 DUNLAP DRIVE PARKER, AZ 85344
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1	HOWARD A. & HELEN F. TWARDOKS 15933 MALDEN STREET NORTH HILLS, CA 91343	E.V. GAULT 9018 LAKEVIEW DRIVE PARKER, AZ 85344
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3	ERNA DAVIS 922 MAX VIEW DRIVE PARKER, AZ 85344	JANCE SCHUE, TRUSTEE SCHUE LIVING TRUST 3706 BLUEGRASS DRIVE LAKE HAVASU CITY, AZ 84606
4		
5	RANDY R. & LISA T. POOLE 8019 E. GRAY ROAD SCOTTSDALE, AZ 85260	MELVIN E. HEGLER 18729 LEMARSH NORTHRIDGE, CA 91324
6		
7	JOSEPH & ALIS E. TROYA; PETER W. & ILENE KRAEMER 3551 AMES PLACE CARLSBAD, CA 92008	MICHAEL S. & MARIE B. MENDEZ 4091 CARROLL COURT CHINO, CA 91710
8		
9	JOHN W. & CATHERINE M. MARCHESI TRUSTEES, MARCHESI FAMILY TRUST 3224 HILL VIEW DRIVE, SOUTH CHINO, CA 91710	GERALD D. FLORES 814 ANDERSON COURT REDLANDS, CA 92374
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12	ANNE GRISHAM 816 NOBLE VIEW DRIVE PARKER, AZ 85344	PAUL L. & CAROL A. PUDEWA 3531 LAMA AVENUE LONG BEACH, CA 90808
13		
14	HOLLIS I. HARVEY 130623 BIG BEAR LAKE, CA 92315	ROBERT & DANIELLE FRANCK 134 VILLA RITA DRIVE LA HARBRA HEIGHTS, CA 90631
15		
16	KEVIN R. & CYNTHIA ANNE RUNGE 4485 SUNBURST DRIVE OCEANSIDE, CA 92056	SCOTT JONES, RT. & CAROLA A. JONES TRUSTEES, JONES REVOCABLE TRUST 7991 INWOOD LANE LA PALMA, CA 90623
17		
18	BERTHA M. SITIES, TRUSTEE P.O. BOX 432 ACME, MI 49610	THEODORE R. & MARY L. MARICAL 711 ROSEWOOD LANE LA HABRA, CA 90631
19		
20	KENT A. & TERESA B. THOMPSON 13811 MAYPORT AVENUE NORWALK, CA 90650	ANDREW P & DEBRA D. GRIMES 904 E. LINGER DRIVE PARKER, AZ 85344
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22	NORMAN R. & DIANNA L. DUMP 9329 LAKE CANYON ROAD SANTEE, CA 92071	EDWARD MARK & BEVERLY A. LAUER 914 LINGER DRIVE PARKER, AZ 85344
23		
24	ROBERT & KATHLEEN THURMAN 415 PORTOLA STREET SAN DIMAS, CA 91773	JANICE POWERS 934 E. LINGER DRIVE PARKER, AZ 85344
25		
26	RONALD J. & PHYLLIS MCDONNELL, TRUSTEES RONALD & PHYLLIS MCDONNELL FAMILY TRUST P.O. BOX 71 MARSING, ID 83639	WILLIAM E. & JEANNETTE L. HORN 954 E. LINGER DRIVE PARKER, AZ 85344
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1	THOMAS W. & TEDDIE JO LORCH, TRUSTEES,	MILDRED R. DANN
2	THOMAS W. LORCH AND TEDDI JO LORCH TRUST	2195 N. SLOPE TERRACE
3	2948 VIA BIANCO	SPRING VALLEY, CA 91977
	SAN CLEMENTE, CA 92673	
4	PHILIP J. GARCIA & DEBORAH A. AURENCE	CLYDE L. & JEANNE F. HENTZEN
5	3152 WALKDER LEE DRIVE	2949 DUNLAP DRIVE
	LOS ALAMITOS, CA 90720	PARKER, AZ 85344
6	RICK J. MCCURDY	VERNON G. & LORETTA J. KRAUS
7	6417 SHERMAN WAY	5388 W. JAGGER ROAD
	BELL, CA 90201	LUDINGTON, MI 49431
8	SHANE JOLICOEUR	EDWARD F. MUELLER
9	852 E. LINGER DRIVE	6684 VINAL HAVEN COURT
	PARKER, AZ 85344	CYPRESS, CA 90630
10	GARY W. SMITH	DAVID M. & RENEE L. WELKER
11	791 E. LINGER DRIVE	2875 HILLCREST DRIVE
	PARKER, AZ 85344	PARKER, AZ 85344
12	THOMAS F. ANDERSON, ERNEST VANIER, & ROBERT K.	DOUGLAS & KAREN GREER
	ANDERSON	37293 MARINA VIEW
13	2918 REDWOOD CIRCLE	PARKER, AZ 85344
	FULLERTON, CA 92635	
14	TOM W. & KATHRYN A. AYERS, TRUSTEES, AYERS	ADAM G. MADRIGAL
15	REVOCABLE TRUST	315 HAMILTON STREET
16	40795 NICOLE COURT	COSTA MESA, CA 92627
	HEMET, CA 92544	
17	GERALD & SHAWNA JOHNSON	GREGORY K. & MICHELLE L. WALSH
18	2855 HILLCREST DRIVE	15611 OBSIDIAN CT.
	PARKER, AZ 85344	CHINO HILLS, CA 91709
19	BRIAN BOLTON	BETH S. SHAMNURG & JEFFREY G. JOHNSON
20	#2 VISTA DEL SOL	2775 HILLCREST DRIVE
	LAGUNA BEACH, CA 92651	PARKER, AZ 85344
21	ANDRE M. & LINDA E. DURAN & RUDY E. & SIMONETTE E.	LARRY E. & LAURA S. GRESETH
	LOVATO	1026 YAVAPAI HILLS DRIVE
22	23147 DONAHUE COURT	PRESCOTT, AZ 86301
	MORENO VALLEY, CA 92553	
23	CHARLES JOSEPH SWN	JOHN JACOB WESTRA & CALVIN NYLES WESTRA, TRUSTEES
24	2801 HILLCREST DRIVE	WESTRA FAMILY TRUST
25	PARKER, AZ 85344	4379 HWY 147
		LAKE ALMANOR, CA 96137
26	MICHAEL E. & MELANIE A. STEWART	CALEB J. & KRISTINA A. BRANDEL & JUDITH B.
27	2793 HILLCREST DRIVE	SHIPLEY
	PARKER, AZ 85344	7307 LENOX
28		RIVERSIDE, CA 92504

1	MARK S. & JEANNINE LONG 548 WOODHAVEN COURT UPLAND, CA 91786	DELVIN G. & GERTRUDE A. WARREN; JENNA MESSINA 278 AGATE WAY BROOMFIELD, CO 80020
2		
3	HILLCREST BAY, INC. 924 BAY VIEW DRIVE PARKER, AZ 85344	THOMAS J. GEALY, IV & DENISE M. GEALY EDWARD F. FERRALL, SR. & MARGARET FERRALL; & EDWARD FERRALL, JR. & SUSAN L. FERRALL 18250 DEVONWOOD CIRCLE FOUNTAIN VALLEY, CA 92708
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6	WILLIAM H. & SHARI D. DAGE P.O. BOX 1297 BANNING, CA 92220	JERRY & KELLY GOODMAN 68440 TAHQUITZ RD., #4 CATHEDRAL CITY, CA 92234
7		
8	LA PAZ COUNTY 1108 JOSHUA AVENUE PARKER, AZ 85344	JOHN R. & JUDITY L.P. MCLEAN, DALLSA NOX C/O; ATTN: BILL RECEIPT AREA 5081 NORRIS STREET IRVINE, CA 92604
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10		
11	HILLCREST WATER COMPANY 915 E. BETHANY HOME ROAD PHOENIX, AZ 85014	FRANK I. & JAN (AKA JANET) ROBLES P.O. BOX 31417 TUCSON, AZ 85751
12		
13	MARTIN BRANNAN LA PAZ COUNTY ATTORNEY 1320 KOFA AVENUE PARKER, AZ 85344	CRAIG A. & CINDY S. MARTIN, TRUSTEES MARTIN FAMILY REVOCABLE TRUST 2184 CARTWHEEL CIRCLE CORONA, CA 92880
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16	ROBYN L. STEIN 2338 N. EATON COURT ORANGE, CA 92867	WILLIAM M. & JOAN WHITTLINGER TED & MARY WHITTLINGER 49071 DENTON ROAD - APT. 106 BELLEVILLE, MI 48111
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18	MALLIETT INVESTMENTS, LLC 5373 W. FIRST STREET LUDINGTON, MI 49431	RONALD & SYLVIA NELSON 835 MAX VIEW DRIVE PARKER, AZ 85344
19		
20	CHARLES S. & BARBARA A. MANNING, TRUSTEES 29214 OLD WRANGER ROAD CANYON LAKE, CA 92587	SCOTT K. JONES, SR. & CAROLA A. JONES, TRUSTEES, JONES REVOCABLE TRUST 7991 INWOOD LANE LA PALMA, CA 90623
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23	MATTHEW ANNALA 13122 OLYMPIA WAY SANTA ANA, CA 92705	LAURENCE A. & MARJORIE WARD 867 E. LINGER DRIVE PARKER, AZ 85344
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25	JOHN W. LOURKOS & JAMIE BRANDEL WILLIAM W. & GERALDINE BERANDEL 14255 JUDY ANN DRIVE RIVERSIDE, CA 92503	CYNTHIA I. MILES & SANDRA L. MAGANA 961 N. CLEVELAND STREET ORANGE, CA 92867
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1	GARY J. SCHMITT 3229 KLUK LANE, SUITE 100 RIVERSIDE, CA 92501	PAMELA A. LEGGETT, TRUSTEE PAMELA A. LEGGETT REVOCABLE TRUST P.O. BOX 1395 PARKER, AZ 85344
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3	CARLSON T. & DARLENE E. LOFTIS, TRUSTEES	RUBEN GOMEZ, JR. & DIANE GOMEA;
4	CARLSON T. LOFTIS & DARLENE E. LOFTIS REVOCABLE LIVING TRUST 54 WEST FOREST TRAIL FREE SOIL, MI 49411	WILLIAM C. & CONSTANCE F. RIACH & JED WILLIAM RIACH P.O. BOX 112 RUNNING SPRINGS, CA 92382
5		
6	ROBERT & LORI NELSON P.O. BOX 401971 HERPERIA, CA 92340	DONALD & MELODY CLARK 16900 TAFT STREET RIVERSIDE, CA 92508
7		
8	LINDA KAY CLAMP & DAVID EDWARD SEAVER 3457 EL CAMINO REAL PALO ALTO, CA 94306	DAN & TERI PETERS 5838 APPECROSS DRIVE RIVERSIDE, CA 92507
9		
10	MARVIN L. & JOAN K. JORDAN P.O. BOX 228 LA QUINTA, CA 92253	TROY & TAMMIE WARD 41755 CASCADE COURT TEMECULA, CA 92591
11		
12	LOUIS M. & LINDA D. WILSON 4421 E. VALLEY GATE ANAHEIM HILLS, CA 92807	MICHAEL J. SCHAPER 7383 SVL BOX VICTORVILLE, CA 92392
13		
14	RAYMOND G. GROSSMAN, SR. & ANN M. GROSSMAN 118 N MORADA WEST COVINA, CA 91790	ELIZABETH A. HACKE 858 BAY VIEW DRIVE PARKER, AZ 85344
15		
16	EDWARD WOODWORTH DEUEL III & NANCY LEE DEUEL, TRUSTEES, EDWARD AND NANCY DEUEL FAMILY TRUST 6892 VIA CARONA DRIVE HUNTINGTON BEACH, CA 92647	TIMOTHY & JOLA NETTE HUBBS P.O. BOX 474 RUNNING SPRINGS, CA 92382
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18	ALBERT L. & MARIA G. REYES 11751 ROSWELL AVENUE CHINO, CA 91710	BARBARA A. DEMEREST 11616 RECHE CANYON RD. COLTON, CA 92324
19		
20	JOHNNY A. & BILLIE DODSON 816 BAY VIEW DRIVE PARKER, AZ 85344	NANDO F. HAASE & DONNA C. MERRILL 830 BAY VIEW DRIVE PARKER, AZ 85344
21		
22	ROY & MARGARET HOKENSON 880 BAY VIEW PARKER, AZ 85344	WAYNE D. & ZELMA M. DUNHAM TRUSTEES, DUNHAM FAMILY TRUST P.O. BOX 68 SAN CLEMENTE, CA 92674
23		
24	KELLI SMITH 927 HIGH COUNTRY GLEN DORA, CA 91740	WESLEY E. BERGSTRON SR. & THERESE BERGSTRON, WESLEY E. GERSTRON, JR. 25681 PALMWOOD DRIVE MORENO VALLEY, CA 92557
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1	CARL ALVARADO & SHERRY CRAVEN 791 BAY VIEW DRIVE PARKER, AZ 85344	GEORGE NAULT LA PAZ COUNTY ASSESSOR 1112 JOSHUA AVENUE, STE. 204 PARKER, AZ 85344
2		
3	DOWELL A. & KATHERINE S. KUBICA	ROBERT P. & CAROL E. BISCHOFF,
4	TRUSTEES, DOWELL A. KUBICA & KATHERINE S. KUBICA	TRUSTEES, BISCHOFF LIVING TRUST
5	FAMILY TRUST 6819 TAHITI DRIVE CYPRESS, CA 90630	651 CENTER CREST REDLAND, CA 92373
6		
7	KENNETH R. HEPLER, JR. 40735 LA COLIMA TEMECULA, CA 92591	MICHELLE M. GAYLER P.O. BOX 1413 THERMA, CA 92274
8		
9	RICHARD L. & HELEN T. POWELL 874 NOBLE VIEW DRIVE PARKER, AZ 85344	HAROLD ERIC & KATHIE JO JONES 4715 E. WARWOOD ROAD LONG BEACH, CA 90808
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11	ALBERT & AMELIA NEVARES 4756 MURIETTA STREET CHINO, CA 91710	DAVID P. & PATRICIA CARMICHAEL 912 S. EASTHILLS DRIVE WEST COVINA, CA 97191
12		
13	KENT A. & TERESA B. THOMPSON 13811 MAYPORT AVENUE NORWALK, CA 90650	ROBERT L. & ROBERTA A. GOLISH 501 N. CLENTINE STREET ANAHEIM, CA 92801
14		
15	KENNETH J. & EILEEN K. THOMPSON, TRUSTEES 78710 DARRELL DRIVE BERMUDA DUNES, CA 92201	FILMORE H. ANDERSON VIRGINIA L. ANDERSON 920 E. SWAN DRIVE PARKER, AZ 85344
16		
17	LYNDA LEDBETTER 570 RIM VIEW DRIVE TWIN FALLS, ID 83301	JOHN M. & PEGGY J. STEINER, TRUSTEES STEINGER FAMILY TRUST 3220 SARATOGA AVENUE LAKE HAVASU CITY, AZ 86406
18		
19	STEVE BENTON & DELIA ALVARADO 2948 S. NOBLE VIEW DRIVE PARKER, AZ 85344	GERALD C. & CAROLA L. MCGINNIS TRUSTEES, MCGINNIS FAMILY TRUST 3370 LEES AVENUE LONG BEACH, CA 90808
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22	ROGER ANDREW & SALLEY JEANNE SHORE, TRUSTEES	STUART & DENISE CURRIE RICHARD J & ANDREA WILKE, TRUSTEES
23	SHORE FAMILY REVOCABLE LIVING TRUST 21225 PINEBLUFF DRIVE TRABUCO CANYON, CA 92679	WILKIE FAMILY REVOCABLE TRUST DAVID M. & DOROTHY D. GLYNN 4545 SUNFIELD AVENUE LONG BEACH, CA 90808
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25	GLE M. & EILEEN DALTON 2910 S. MANOR VIEW PARKER, AZ 85344	JACK M. & BARBARA JO HUTCHENS TRUSTEES, HUTCHENS FAMILY TRUST 151 N. HOLGATE LA HABRA, CA 90631
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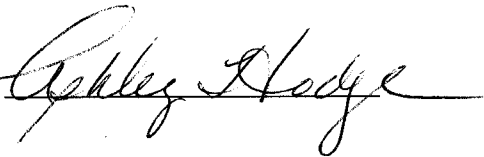
1	BETTY JANE BRYANT & GOLDIE JUNE JORDAN 78976 SPIRIT COURT PALM DESERT, CA 92211	CLARK & PIPER A. SLONE 40641 BEAR CREEK STREET INDIO, CA 92203
2		
3	ANDREW R. & SHANNA S. MCCLOSKEY 5000 WINDY CIRCLE YORBA LINDA, CA 92887	MAC & JOYCE FRAZIER 1777 LEWIS AVENUE LONG BEACH, CA 90813
4		
5	CHARLES E. STIREWALT 2932 BALLESTEROS LANE TUSTIN, CA 92672	DUANE E. & RUTH V. FERGUSON, TRUSTEES FERGUSON TRUST 2814 MANOR VIEW DRIVE PARKER, AZ 85344
6		
7	RICHARD S. & JOY M. MUZIC TRUSTEES, MUZIC LIVING TRUST 10315 FELSON STREET BELLFLOWER, CA 90706	FRED A. & LYNNE S. MUZIC 16411 UNDERHILL LANE HUNTINGTON BEACH, CA 92647
8		
9	LARRY CARTWRIGHT 75 KEEGAN COURT SUSANVILLE, CA 96130	VERONICA PEDREGON 855 BAY VIEW DRIVE PARKER, AZ 85344
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11	JEROME P. & KAREN M. BOWE 849 MAX VIEW DRIVE PARKER, AZ 85344	JOHN D. II & JACQUELINE Y. YARBROUGH TRUSTEES, YARBROUGH REVOCABLE TRUST P.O. BOX 616 PARKER, AZ 85344
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14	GARY L. & SUZANNE A. SMITH 531 APACHE DRIVE PLACENTIA, CA 92870	LOUISE DENVER 889 SWAN DRIVE PARKER, AZ 85344
15		
16	NANCY SUZANNE ARCHER 860 CRYSTAL VIEW DRIVE PARKER, AZ 85344	KAREN L. & JAMES BIBBY 873 SWAN DRIVE PARKER, AZ 85344
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18	RICHARD A. & KIMBERLY E. HAMPTON 1143 ANDREW LANE CORONA, CA 92881	GERALD W. & MICHELLE C. GATLIN & JEFFREY W. & TRACY A. GATLIN 17618 REGENCY CIRCLE BELLFLOWER, CA 90706
19		
20	ALFRED & SHERYL BEAUVAIS 5318 ELK COURT FONTANA, CA 92336	RICHARD R. GERVAIS 5234 CARLINGFORD AVENUE RIVERSIDE, CA 92504
21		
22	KAHNIM POPLER 981 CHARLES STREET BANNING, CA 92220	TERENCE W. BITRICH 1021 N. PUENTE STREET BREA, CA 92821
23		
24	WILLIAM A. BACA 9700 LA CAPILLA AVENUE FOUNTAIN VALLEY, CA 92708	RANDY J. & RACHAEL ANNE STEWART 1826 COMARAGO COURT CORONADO, CA 92833
25		
26	MICHAEL JOSEPH & TAMARA LYNN WILKINSON 4 BELLA FIRENZE LAKE ELSINORE, CA 92532	GEOFFREY WILLIAM LAMBROSE 784 SWAN DRIVE PARKER, AZ 85344
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1 ANNETTE M. KINCAID
1975 W. LINDEN STREET
2 RIVERSIDE, CA 92507

3 SCOTT K. JONES, JR. & ZAHIRA V. DELGADILLO,
TRUSTEES
4 SCOTT K. JONES, JR. & ZAHIRA V. DELGADILLO
JONES REVOCABLE TRUST
5 5732 PLACERVILLE PL.
6 YORBA LINDA, CA 92886

7 DAN R. & VIVIAN T. GOOD, TRUSTEE
DAN R. GOOD & VIVINA T. GOOD
8 DELCARATION OF TRUST
P.O. BOX 53 HWY 108
9 STRAWBERRY, CA 95375

10 LARRY W. & SHEARL LYNN THOMPSON
12642 LAMPLIGHTER
11 GARDEN GROVE, CA 92845

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SHARON ERROR, TRUETT
SHARON ERROR TRUST
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LINK T. & SANDRA C. JOHNSON, TRUSTEES
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FULLERTON, CA 92633